

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN
DISTRICT OF TEXAS HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

**EDWARD CONSTANTINESCU, PERRY
“PJ” MATLOCK, JOHN RYBARCZYK,
GARY DEEL,**

**STEFAN HRVATIN,
TOM COOPERMAN, MITCHELL
HENNESSEY, and DANIEL KNIGHT**

**Case No. 4:22-cr-612-S
Violations: 18 U.S.C. § 1349;
18 U.S.C. §§ 1348 & 2; and
18 U.S.C. § 1957(a).**

AFFIDAVIT OF AARON HUGHES

Before me, the undersigned authority, on this day personally appeared, Aaron Hughes, who, after being duly sworn, did depose and state the following:

1. My name is Aaron Hughes. I am over the age of eighteen (18) years, of sound mind, and there is no legal impediment to my giving this affidavit. The facts described herein are within my personal knowledge, and are true and correct. I am also a licensed private investigator in the State of Texas, as required by Texas occupational code and I have completed training in digital forensics administered by Southern Methodist University.
2. I am the President of Vidoc Razor, LLC, which performs computer security and forensics services for clients throughout Texas and the United States. I am a licensed private investigator in the State of Texas, and I have completed digital forensics training at Southern Methodist University. I have more than 20 years of experience providing digital forensics services and have been engaged in many cases litigated before various courts as a consulting expert, as well as a testifying expert. In my 20 years of information forensics work I have never been disqualified as an expert in any court.

3. I have been retained by three defendants in this matter: Gary Deel, Tommy Cooperman, and Perry Matlock. My compensation is not contingent upon any outcome of the case but is charged for my time to study the issues. My opinion is not contingent upon compensation but rather is based on the facts at hand based on my experience and professional opinion in the field of data forensics. My Curriculum Vitae is attached to this affidavit.
4. On August 29, 2023, counsel for the DOJ filed "United States' Response to Defendants Deel and Matlock's Motion for a Continuance". In this response, counsel states that they are unclear "why his work will yield admissible evidence that would justify moving trial date".
5. I have drafted this affidavit to give specific examples using one of the DOJ's stock ticker symbols, "TRCH" (Torchlight Energy). These same issues need to be researched for each ticker symbol.
6. In its case, the DOJ has alleged that the defendants were responsible for artificially driving various stock tickers, including TRCH, upwards and then "dumping" the stock. This is typically referred to as a "pump and dump" scheme.
7. The SEC's website, "investor.gov" defines a "Pump and Dump" in the following way:

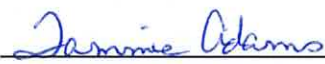
"In a pump and dump scheme, fraudsters typically spread false or misleading information to create a buying frenzy that will "pump" up the price of a stock and then "dump" shares of the stock by selling their own shares at the inflated price."
(Source: <https://www.investor.gov/introduction-investing/investing-basics/glossary/pump-and-dump-schemes>)
8. The SEC's own description states that false, or misleading information is used to drive the "frenzy" that will "pump" the price.
9. Implied in this definition is the assumption the defendants have enough "clout" (influence) to create such a movement.
10. Specific to TRCH, the government points to the February 2021 timeframe, and the sudden increases in trade volume, and price.
11. In my research specific to TRCH, I found that the general market consensus on TRCH, in the February 2021 timeframe, was that it was a good buy.
12. In fact, NASDAQ.com, the official website for the NASDAQ, published an article on their website titled, "TRCH Stock Alert: Why Torchlight Energy Shares Are Blazing Higher Today". This was published on February 16, 2021, precisely during the same timeframe as charged by the government regarding TRCH.

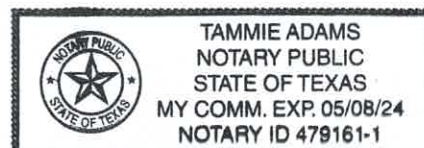
13. The article also explains, and gives alternate reasons for why TRCH stock was “Blazing Higher Today”:
 1. Torchlight Energy had announced it no longer had any long term debt.
 2. The debt was eliminated by converting all of its existing debt into shares of TRCH stock.
 3. Blanket liens on two of its projects were released.
 4. TRCH had announced the completion of a public offering, just the prior week.
14. I have not seen any of these facts within the government’s production.
15. In its “Superseding Indictment” filed February 8, 2023, the government states the follower numbers. Presumably, this is because of the implied assumption discussed above: There has to be enough “clout” (influence) to be able to move an entire market and create a groundswell (the “Pump”).
16. In the Superseding Indictment, for example, the government states that Tommy Cooperman had over 125,000 followers.
17. While this may be true in late 2022, or early 2023, it was not necessarily true at the time of the actual activity the government complains about.
18. Using Mr. Cooperman as an example, and in keeping with our TRCH example, it is my opinion, based on research and publicly available information, that Mr. Cooperman had closer to 4500 followers during the February 2021 timeframe that is in the government complaint. A lay person would reasonably conclude that isn’t enough to sway entire markets.
19. Added to this, Mr. Elon Musk, the CEO of Twitter, has made public statements that 20% of the followers on Twitter are bots, although a study found it closer to between 5%-11%. I do not see any work by the government, in their production, contemplating this.
20. In fact, I have not identified any analysis, or evidence, of actual follower counts during the relevant timeframes in the documents provided by the government.
21. Each of the individual ticker symbols needs to be researched, government production analyzed, exculpatory and contextual evidence (as discussed above) collected and vetted, and work product created. This is the reason I have requested a three month extension.
22. The government, in its case, also discusses the Atlas Trading discord channel. The discord channel, unfortunately, has been taken down. It is my understanding, based on information from counsel, that the government was responsible for taking it down.

23. Within their production, I do not see the underlying code, or analysis of the code, preserved and presented by the government. Code analysis is squarely within my expertise, and stated on my CV.
24. I am in the process of acquiring the code for the Atlas Discord room, and have the current belief and understanding that there were attestations made by the users upon logon, account creation, and through the process that included warnings, agreements, and encouragements for users to "Do their own research" and make their own decisions.
25. It is also my understanding that there were research references and materials provided to get the users started on their own education.
26. I did not find the government documentation, discussion, or analysis of the code, attestations, or educational resources. It will take time for me to assemble, re-create, and evaluate this.
27. For these reasons, and in order to provide the best possible defense, I will require an additional three months.


Aaron Hughes

SWORN TO AND SUBSCRIBED before me, on this 6th day of September, 2023.


Notary Public, Texas



**Curriculum Vitae
Aaron Hughes**

CONTACT INFORMATION

Vidoc Razor, LLC
46 N. Main St.
Kingwood, TX 77339
Voice: (832) 413-4282
Email: aaron.hughes@vidocrazor.com

EMPLOYMENT

2008 to Present Vidoc Razor, LLC (Houston, Texas)

President. Responsible for day to day management and running of data forensics and electronic investigations business. Areas of responsibility include data forensics consulting, operations, evidence acquisition, evidence storage, analysis, case reporting, case management.

2003. to 2010 IAC SecureTech (Houston, Texas)

President and CEO. Responsible for day to day management and running of a Houston based information security business with client presence across the United States. Areas of responsibility include IT network assessment and audit, information security consulting, response to incidents of intrusion and misuse, ongoing management and monitoring of client networks, and data forensics services.

2000 to 2003 HealthHelp (Houston, Texas)

Network Security Director. Responsible for the creation and implementation of information security for a medical services billing company. Areas of responsibility included development of policy and procedure, monitoring of compliance to policy and procedure, spam and email management, secure architecture, intrusion and incident response, forensic response, employee training and awareness.

1999 to 2000	Telescan (Houston, Texas) Intranet Development. Responsible for development of code used for company intranet. Responsible for secure coding practices and testing.
1997 to 2000	Houston WPD (Houston, Texas) Sole Proprietor. Developed and sold secure internet applications including e-commerce and online inventory tracking systems. Emphasis was on functionality and secure programming.

PROFESSIONAL CERTIFICATIONS

2002 - 2013	Certified Information Systems Security Professional (C.I.S.S.P.)
2007 - Current	Texas State Licensed Private Investigator

EDUCATION AND TRAINING

1987	Diploma, Ithaca High School, Ithaca, NY
1987 – 1989	American University, Washington, DC
2001	SMU Forensics Certificate

RELEVANT SKILL SETS

Programming:

ASP, PHP, PERL, Visual Basic, VBScript, JavaScript, Bash Script, MYSQL, Disassembly and code analysis techniques

Information Security and Forensics Technology:

Intrusion Detection Systems, IDA Dissassembler, FTK Forensics Analysis, Paraben Corporation Forensic Analysis Tools, Autopsy and TCT Forensic Analysis, Oxygen Forensics Tools, Firewall rule development (IPTables, PF, IPFW, Checkpoint, Cisco, Juniper), Router and Switch Configuration (Cisco, Juniper, Sonicwall, OpenBSD, FreeBSD), Bandwidth and Network Analysis Tools (TCPDump, IPTrace, TCPTrace, Pingpath, Ethereal, IPTraf), Tripwire, Syslog, Syslog Analysis, dd, dd_rescue, Nagios, Various command-line tools and libraries

Operating Systems and Forensic Artifacts:

Microsoft Windows (98 through current), Linux OS, BSD OS, Apple iOS, Android Operating Systems, RIM Blackberry, FAT filesystems, NTFS, exFAT, EXT fs

Core Network Technologies

Microsoft Exchange Configuration, Unix, Linux, OpenBSD, FreeBSD, Manual Server Hardening and Configuration, Network Architecture and Design

INNOVATION AND INVENTION

US Patent: EVALUATION NODE FOR REPORTING STATUS VIA A SECURE LINK,
Patent No. US9813439B2

PROFESSIONAL ASSOCIATIONS

- ISC2
2002-2013
- International Information Systems Forensics Association
2003-2005
- Association of Certified Fraud Examiners
2006-2010
- Infragard
2009-2017
- SHSU Center of Excellence in Digital Forensics Advisory Board Member
2011-2012

TESTIMONY

John Murphy et al v. Michael Charles Butler and Harris County, Texas
United States District Court Southern District of Texas, Houston Division
C.A. # H-05-02883 (Deposition)

Mike Miller and Associates Special Events, Inc. v. Lisa Fortenberry
County Court at Law, Rusk County
08-004A (Court - Hearing)

In The Matter of The Marriage of Juanita King Sartori and Michele Pietro Sartori
Harris County 311th District Court
Cause #2007-04372 (Court - Hearing, Trial)

EMS USA v. Centerpoint Energy Services Inc. et al.
270th District Court, Harris County
Cause No. 2007-76069 (Deposition, Trial)

McKinney v. Olson
164th District Court, Harris County
Cause #2009-26543 (Court - Hearing)

Mechdyne Corporation v. Donald Garwood
US District Court for the Southern District of Iowa, Central Division
Cause # 4:08-cv-00451 (Deposition, Trial)

Hallmark Restoration Group, LLC v. Canchola Properties, LLC
US District Court, Southern District of Texas
Cause #4:09-cv-00059 (Hearing, Trial)

M-I v Chad Lee Stelly, et al.
US District Court for the Southern District of Texas, Houston Division
Civil Action No. 4:09-CV-01552 (Deposition, Hearing)

In the Matter of the Marriage of Christopher Jones and Patricia Haule Jones
Harris County 311th District Court
Cause #2011-45155 (Hearing)

In the Matter of the Marriage of Janis B. Huckabee and Charles U. Huckabee and
in the Interest of Alexandra J. Huckabee
Harris County 308th Judicial District
Cause #2012-36328 (Trial)

In the Matter of the Marriage of Nadia Gul Mohyuddin and Javed Rehman
Harris County 247th District Court
Cause #2013-26862 (Hearing)

Raymond G. Houde vs. Pinnacle Engineering, Inc., et al.
55th Civil Court, Harris County
Cause # 2011-07373 (Hearing, Pre-Trial)

LasikPLUS of Texas, P.C. and LCA-Vision, Inc vs. Frederico Mattioli, MD
Harris County 80th Judicial District
Cause #2012-68429 (Hearing)

Tommy Beauchamp, Et Al vs. Stevens Transport, Inc., Et. al
Orange County 163rd Judicial District
Cause # B140314-C (Deposition)

The State of Texas vs. Charles Michael Von Schmidt
Polk County 411th District Court
Cause #24,432 (Trial)

In the Matter of the Marriage of Hugo and Bessy Jimenez
Harris County 507th District Court
Cause #2011-75729 (Hearing)

Mechdyne Corporation v. Stewart Dainty
Iowa District Court for Marshall County
No. LALA008824 (Hearing)

In the Matter of the Marriage of Mark Anthony Freeman and Amanda Guthman
Freeman
505th Judicial Court
No. 17-DCV-243259 (Hearing)

CSE Icon, Inc. v. The Integration Group of Americas, Inc. d/b/a TIGA, et al
270th Judicial District Court of Harris County, TX
No. 2017-22767

FSI Construction, Inc. v. Kelly Martin
American Arbitration Association
No. 01-19-0004-5543

Corrina B. Kenwisher v. Sears Holdings Management Corporation, Sears
Roebuck and Co., and Abraham Gonzales
57th Judicial District
Cause No. 2017CI11345

In the Matter of the Marriage of Damon DiBassie and Michele Dibassie
418th Judicial District
Cause No. 19-01-00879

Waco Herrera v. Armando Robles, and Lesley Services LLC v. Andrew Salazar
73rd Judicial District
Cause No. 2018-CI-21723

ARTICLES, SPEECHES AND PUBLICATIONS

- **Speaker:** “Privacy and Security in the Workplace,” SOCIETY OF HUMAN RESOURCE MANAGERS (2003 and 2004)
- **Speaker:** “Platform Singularity and the Risks of ‘Monoculture’,” INFOSEC RADIO (2003)
- **Speaker:** “Ensuring Compliance within Policies, Procedures, Systems and Controls,” THE ENERGY FORUM – SOX IN THE PATCH ROUNDTABLE (2004)
- **Speaker:** “Digital Discovery and Data Forensics: An Attorney’s Primer,” BOYAR & MILLER LAW FIRM (2005)
- **Speaker:** “The Workplace Fingerprint,” BOYAR & MILLER LAW FIRM (2005)
- **Author:** “Information Security – The Smart Way,” RT Image Magazine (Dec. 2006)
- **Speaker:** “Identity Theft: Fact vs. FUD,” The Association of Certified Fraud Examiners (ACFE) (2007)
- **Author:** “Seven Uses of Open-Source Software for the Digital Forensic Lab,” Evidence Technology Magazine (January – February 2007 Edition)
- **Author:** “Effective Security Management,” American Bar Association Digital Times (Technology for the Litigator Committee) (Spring 2007)
- **Speaker:** “CLE Course: Computer Forensics,” Harris County Criminal Lawyers Association (April 2007)
- **Speaker:** “Sarbanes Oxley: Information Security, Forensics and Detecting Fraud,” The Association of Certified Fraud Examiners (ACFE) (2007)
- **Speaker:** “Forensically Sound Incident Response,” The Association of Information Technology Professionals (AITP) (2007)
- **Speaker:** “Credit Course: Computer Related Evidence – Acquisition and Preservation,” Institute for Paralegal Education (Sept. 2007)
- **Speaker:** “Common Sense Security Strategies: Building and Maintaining an Effective Security Program,” Texas Health Information Managers Association (TXHIMA) (Sept 2007)
- **Speaker:** “Privacy and Security in the Workplace,” Alamo Area Health Information Managers Association (AAHIMA) (Nov 2007)
- **Speaker:** “Incident Response: Electronic Data Handling Procedures,” The Association of Certified Fraud Examiners (ACFE) (December 2007)
- **Speaker:** “Building and Managing a Corporate Incident Response Team,” Information Systems Audit and Control Association (ISACA) (February 2008)
- **Speaker:** “Preventing and Detecting Fraud in an Information Systems Environment,” Texas State Auditor's Office 2008 Audit Leadership and Management Conference (2 CPE Credits)(May 2008)
- **Speaker:** “Infosec: What the Physical Security Practitioner Should Know,” the American Society for Industrial Security (ASIS) Houston Chapter (May 2008)

- **Speaker:** “Data Forensics: Identification of Anonymous Entities and Motives,” The International Association for Identification (Texas Division – TDIAT) (June 2008)
- **Speaker:** “Common Sense Security Strategies: Building a Sustainable Information Security Program,” The Institute of Internal Auditors (Houston IIA) (July 2008)
- **Speaker:** “CLE Course: Information Forensics: Qualifying and Using an Expert,” Dallas Women Lawyers Association (September 2008)
- **Speaker:** “Common Sense Security Strategies: Building a Sustainable Information Security Program,” The Institute of Internal Auditors (Austin IIA) (October 2008)
- **Speaker:** “CLE Course: Information Forensics: Qualifying and Using an Expert,” Northeast Harris County Bar Association (October 2008)
- **Speaker:** “Privacy and Fraud Monitoring in the Workplace,” The Association of Certified Fraud Examiners (Houston ACFE) (January 2009)
- **Speaker:** “Data Forensics: Identification of Anonymous Entities and Motives,” Information Systems Audit and Control Association (ISACA) and The Institute of Internal Auditors (IIA) (San Antonio - Joint Meeting) (January 2009)
- **Speaker:** “CLE Course: Information Forensics: Qualifying and Using an Expert,” Bexar County Women’s Bar Association (February 2009)
- **Speaker:** “Deep Web Search Techniques and Investigations,” Secureworld Expo - Fraud and Forgery Roundtable (February 2009)
- **Speaker:** “Incident Response: Electronic Data Handling Procedures,” Secureworld Expo (February 2009)
- **Speaker:** “Data Forensics: Identification of Anonymous Entities and Motives,” Internal Association of Financial Crimes Investigators (IAFCI) (March 2009)
- **Speaker:** “Qualifying and Using a Data Forensics Expert,” The Computer Forensics Show - Washington, DC (April 2009)
- **Speaker:** “Information Forensics Investigative Techniques: Evidence Beyond the Hard Drive,” Houston HPD Cyber Squad, FBI Cyber Squad (July 2009)
- **Panel Participant:** “Electronic Evidence Workshop,” State Bar of Texas CLE Program, Advanced Family Law - Dallas, TX (August 2009)
- **Panel Participant:** “Discovering Hidden Assets: the Use of Formal Discovery Requests, Forensic Investigators, Internet Research and Other Means to Find Assets,” State Bar of Texas CLE Program, Advanced Family Law - Dallas, TX (August 2009)
- **Speaker:** “Cell Phone Forensics,” Texas Criminal Defense Lawyers Association Forensic Seminar (October 2009)
- **Speaker:** “Information Forensics: Qualifying and Using an Expert,” Lawline.com Online CLE Courses (October 2009)
- **Speaker:** “Information Forensics Investigative Techniques: Evidence Beyond the Hard Drive,” Houston HPD Cyber Squad, FBI Cyber Squad (Eight Hour TCLEOSE Qualified) (December 2009)
- **Speaker:** “Techniques for Network Forensics,” Amarillo ISSA (International Systems Security Association) (January 2010)

- **Speaker:** “Incorporating Electronic Information Forensics With Investigations,” ACFE (Association of Certified Fraud Examiners) (CE Qualified) (February 2010)
- **Speaker:** “Strategies for Controlling Information Forensic Costs,” District 1 State Bar of Texas Paralegal Division (CLE Qualified) (February 2010)
- **Speaker:** “Information Forensics and Electronic Investigation: Identifying Sources and Roles of Digital Evidence in Investigations,” ASIS International (March 2010)
- **Speaker:** “Effective Use of Information Forensics,” NACDL 3rd Annual Making Sense of Science Seminar (CLE Qualified) (March 2010)
- **Speaker:** “Information Forensics: The Collection and Evaluation of Electronic Evidence,” FEWA (Forensic Expert Witness Association) (April 2010)
- **Speaker:** “Ethical and Criminal Considerations in the Age of Electronic Evidence,” State Bar of Texas CLE Program, Advanced Family Law - Houston, TX (August 2012)
- **Speaker:** “Cryptocurrencies: Overview and Vulnerabilities,” FBI Financial Institution Crime Day - Federal Reserve Bank, Houston, TX (March 2014)
- **Speaker:** “The Information of Things™ : Gathering Case-Related Intelligence From Unexpected Places”, State Bar of Texas College 18th Annual Summer School (CLE Qualified) (July 2016)
- **Speaker:** “The Information of Things™: Wielding Information and Defending Against Information Attacks”, Fort Bend County Bar Association (CLE Qualified) (March 2017)
- **Author:** “Electronic Evidence for Family Law Attorneys,” American Bar Association Publishing, ISBN: 978-1-63425-567-7, (Peer reviewed) (2017)
- **Co-Presenter:** “Spy Torts and Privacy Issues in Family Law,” State Bar of Texas CLE Program, Advanced Family Law - San Antonio, TX (August 2021)

REFERENCES AND ENDORSEMENTS



Annise D. Parker, Mayor

CITY OF HOUSTON

Houston Police Department

1200 Travis Houston, Texas 77002-6000 713/308-1600

CITY COUNCIL MEMBERS: Brenda Stardig Jarvis Johnson Anne Clutterbuck Wanda Adams Michael Sullivan Al Hoang Oliver Pennington Edward Gonzalez
James G. Rodriguez Stephen C. Costello Sue Lovell Melissa Noriega C. O. "Brad" Bradford Jolanda "Jo" Jones CITY CONTROLLER: Ronald C. Green

September 29, 2010

Charles A. McClelland, Jr.
Chief of Police



To Whom It May Concern:

My first contact with Aaron Hughes and Vidoc Razor was approximately two years ago when I was asked to review a civil litigation case for potential criminal action. I was impressed with the work, investigative approach and organization of the information that was presented to me.

Since then I have worked with Aaron and Vidoc on different matters in my capacity with the Houston Police Department's Major Offenders Division and the FBI-Houston Cyber Crimes Task Force. This includes organizing an eight hour TCLEOSE (law enforcement education credits) certified training conducted at the Department of Justice's Regional Computer Forensics Lab that included representatives from the FBI, Customs (ICE), HPD Homicide, HPD Sex Crimes unit, as well as others.

The various law enforcement divisions are aware of Aaron and the work being done at Vidoc Razor.

In fact, as needed I, and others I know in law enforcement at various levels, have called upon Aaron to write specialty forensic software to fill in the large gaps left by current commercial software being used. Aaron's specialty software is being used actively in current cases.

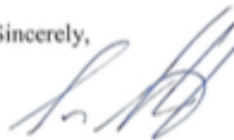
I am aware of the capability that Aaron is writing into the FED(ng) appliance, and while I cannot make promises on behalf of the city or other units, I can say the following:

- The current software we use is lacking in specific features and capability that Aaron's offering will provide.
- Features of the offering Aaron proposes have been broken out into standalone software that is being used very effectively in current cases.
- The training and capability that Aaron has provided along these lines has been invaluable in the successful pursuit of various types of criminal investigations. Because of this, there is a distinct level of interest and excitement in further capabilities that extends into the upper levels of different law enforcement agencies.
- If the FED(ng) appliance meets the features and capability as I understand them, then it would be considered as a product to replace or at least augment the commercial software currently in use.



We are following Aaron's work and look forward with a great deal of interest to the completion of the project, and I have no problem throwing my support behind the knowledge and work that he has done.

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. M. Garrett', with a stylized flourish at the end.

G. M. Garrett, Senior Police Officer
Major Offenders Division

I may be contacted for further reference at listings below:

G.M. (Mike) Garrett
Senior Police Officer
Houston Police Dept. Major Offenders Division
FBI-Houston Area Cyber Crimes Task Force
713-936-8378
Fax 713-936-8925
mike.garrett@cityofhouston.net

gmg:gmg

TeleCheck Services, Inc.
5251 Westheimer (77056-5404)
P.O. Box 4514
Houston, Texas 77210-4514
(713) 331-7600



09-13-2010

To whom it may concern:

I have known Mr. Aaron Hughes for almost three-years and have utilized his knowledge in various capacities in areas of electronic evidence, forensics and open source intelligence.

I know him to be a national expert, knowledgeable and most professional with his forensic skill set and competencies. He has been referred on many occasions to others without hesitation, as his ethics and integrity in the forensic profession is well known.

In addition, in my capacity as Director of Security, Mr. Hughes has spoken at our Forgery Roundtable event (Law Enforcement/Corporate Fraud Investigators) at the SecureWorld Expo/Conference in the past and was well received. Mr. Hughes was the keynote speaker at the event in Houston, TX and provided invaluable training to law enforcement and fraud investigators from major corporations. Today, these same skill sets are being utilized daily by these investigators in their day/day investigations.

Without hesitation, I would recommend Mr. Hughes in any Forensic Investigation!

Kind Regards,

A handwritten signature in black ink, appearing to read 'Charles E. Andrews', written in a cursive style.

Charles E. Andrews, CFE, CFS, CFCI, ICPS
DIRECTOR OF SECURITY
TeleCheck, a First Data Corporation
5251 Westheimer
Houston, TX 77056
(713) 331-6552 - Office
(281) 450-5890 - Cell
(402) 916-7934 - Fax
Charles.Andrews@TeleCheck.com





ATTORNEY GENERAL OF TEXAS
GREG ABBOTT

September 13, 2010

To Whom It May Concern:

We have used Aaron Hughes, CISSP, in consultation regarding information on forensics and electronic evidence for various matters that involving significant litigation and of high import to the State of Texas. In connection with such, we have become familiar with his capabilities.

He exhibits the highest levels of not only professionalism and capability, but also honesty and objectivity. This objectivity is valued as it allows us to maximize our resources in accumulating evidence in support of our litigation. Perhaps of the best benefit has been the ability to avoid the rabbit trails, while gathering key digital evidence. Mr. Hughes quickly grasps the strategies and keys that we are searching for during discovery. His support has been without parallel in the industry.

We have no reservations in providing a reference and recommendation for Mr. Hughes and Vidoc Razor.

Kind Regards,

Paul H. Masters
Assistant Attorney General
Taxation Division
Phone: (512) 475-1743
Fax: (512) 478-4013

PHM/ms